

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	§	
	§	
<b>CARMEN ROMAN</b>	§	<b>CASE NO. 16-32137-H3</b>
	§	
<b>DEBTOR.</b>	§	<b>CHAPTER 13</b>

**MOTION TO RECONSIDER**

(Relates to Docket No. 24)

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THIS MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN TWENTY-ONE (21) DAYS FROM THE DATE THAT THIS MOTION WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED; IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**THE DEBTOR HAS REQUESTED EMERGENCY CONSIDERATION OF THIS MOTION. ACCORDINGLY, THE COURT MAY ACT EXPEDITIOUSLY ON THE MATTER. IF THE COURT SETS THIS MOTION FOR AN EMERGENCY HEARING, ATTENDANCE AT THIS HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS.**

**EMERGENCY RELIEF HAS BEEN REQUESTED AND IF THE COURT CONSIDERS THIS MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN TWENTY-ONE (21) DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF, OR IF YOU BELIEVE THAT EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

**To the Honorable Letitia Z. Paul:**

COMES NOW, Carmen Roman, Debtor in this Chapter 13 Bankruptcy Case, who respectfully moves this Court to reconsider the Order Dismissing Debtor (Docket No. 24) and would show as follows:

1. Debtor filed her voluntary petition for relief on April 28, 2016 under Chapter 13 of Title 11, United States Code 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”) for the purpose of saving her home from foreclosure. The Debtor's case is pending before the United States Bankruptcy Court for the Southern District of Texas, Houston Division.

2. On April 29, 2016 this Court issued a deficiency Order (Docket No. 6).

3. Debtor filed a Motion to Extend the Automatic Stay which was granted on November 4, 2015 (Docket No. 35).

4. Debtor has reviewed Debtor's schedules and plan with Debtor and filed them with this Court; however, Debtor's counsel erroneously believed Debtor's pay advices were filed via CM/EF on June 1, 2016, along with Debtor's Statement of Financial Affairs and Statement of Current Monthly Income.

5. Debtor's pay advices were filed on June 21, 2016 (Docket No. 25).

6. Debtor implores this Court to reconsider the Order dismissing the Debtor under 11 U.S.C. § 105 as Debtor has no automatic stay and Debtor's Plan is confirmable.

Date: June 21, 2016

Respectfully submitted,

**CORRAL TRAN SINGH, LLP**

/s/Susan Tran

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**ATTORNEYS FOR DEBTOR**

**CERTIFICATE OF SERVICE**

I hereby certify under penalty of perjury that a copy of the foregoing Motion was delivered to the following interested parties on the attached creditor matrix via first class U.S. Mail, facsimile, or electronic notice on June 21, 2016.

/s/Susan Tran  
Susan Tran